

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

NEO WIRELESS, LLC,

Plaintiff

vs.

DELL TECHNOLOGIES INC. and DELL
INC.

Defendants.

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NO. 6:21-cv-024- ADA

JURY TRIAL DEMANDED

**DECLARATION OF MARI KENNEDY IN SUPPORT OF
DEFENDANTS' MOTION FOR INTRA-DISTRICT TRANSFER**

I, Mari Kennedy, declare as follows:

1. I am employed as the Director and Chief of Staff in the Human Resources department at Dell. In this role, I am Lead Strategist for Global HR Services and I manage HR Compliance. I also serve as Chief of Staff and have managed HR functions for Dell for more than nine years.

2. In making this declaration, I have relied on my understanding of Dell's corporate and HR structure. I have also relied on business records showing the business address and home address of certain Dell employees. Those records are created from information transmitted by knowledgeable persons, and they are kept in the course of Dell's regularly conducted business activity. It is Dell's regular practice to maintain the business records upon which I relied.

3. I submit this declaration in support of Defendants Dell Inc. and Dell Technologies Inc.'s (collectively "Dell") Motion for Intra-District Transfer to the Austin Division of the Western District of Texas in the above-captioned litigation.

4. I have been informed and understand that plaintiff Neo Wireless, LLC (“Neo Wireless”) has filed this lawsuit in the Waco Division of the Western District. I am further informed and understand that the Waco Division of the Western District includes the following counties: Bell, Bosque, Coryell, Falls, Freestone, Hamilton, Hill, Leon, Limestone, McLennan, Milam, Robertson, and Somervell. It is also my understanding that some of the cities in the Waco Division are Belton, Centerville, Hillsboro, Killeen, Temple, and Waco.

5. Dell’s worldwide headquarters are in Round Rock, Texas, and Dell has had its worldwide headquarters in the Austin/Round Rock area since the company was founded in Austin in 1984. Dell has significant operations in Austin and Round Rock. Dell currently employs more than 14,000 people in the Austin/Round Rock area, and Dell is consistently among Austin’s top five largest employers. Dell does not maintain a place of business in the Waco Division of the Western District of Texas.

6. I understand that Neo Wireless has accused Dell of infringing its patents through the sale of Dell products that include LTE, 4G, or 5G technology and that Neo Wireless has specifically accused the following Dell products: Latitude 3510, Latitude 5310, Latitude 3190, Latitude 7220EX Rugged Extreme Tablet, and Latitude 7220 Rugged Extreme Tablet (hereinafter “the Accused Products”).

7. Numerous Dell employees with knowledge of Dell’s design, development, marketing, or sales of the Accused Products are located in the Austin/Round Rock area. In addition, the Dell engineering team for LTE, 4G, and 5G technology in the Accused Products is primarily located in Austin, Texas. Those employees include:

Name	Title	Business Location – Place of Residence
Reynaldo Garcia	Consultant, Commodity Management	Remote – Round Rock, Texas
Kevin McCann	Vice President, Consumer Client Engineering	Austin – Cedar Park, Texas
Mike Hareng	Director, Systems Development Engineering	Austin – Cedar Park, Texas
Omar Diaz	Consultant, Strategic Business Development	Austin – Round Rock, Texas
Steve Cho	Distinguished Engineer	Austin – Cedar Park, Texas
Danlu Huang	Consultant, Commodity Management	Remote – Cedar Park, Texas

8. The above-identified individuals have electronic documents, including engineering, procurement, marketing, and financial documents relating to the Accused Products, on equipment located in the Austin Division.

9. Dell's engineering, procurement, sales, and financial documents relating to the Accused Products are primarily located in Austin or Round Rock. I understand that all document collection will take place in Austin or Round Rock.

10. I am not aware of and Dell has not identified any employees who are located in the Waco Division and who are involved in the Dell engineering team for LTE, 4G, and 5G technology. I am further not aware of and Dell also has not identified any employees who are located in the Waco Division and who are involved in the procurement, marketing, or financial functions related to LTE, 4G, and 5G technology.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 13, 2021 in Austin, Texas

A handwritten signature in blue ink, appearing to read 'Mari Kennedy', is written over a horizontal line.

Mari Kennedy,
Director, Strategy, Operations and
Chief of Staff, for Global HR Services
Dell Technologies Inc.